



Wall Street Plaza  
88 Pine Street, 32nd Floor, New York, NY 10005  
Tel: 212-867-4100 Fax: 212-867-4118  
[www.fkblaw.com](http://www.fkblaw.com)

May 27, 2025

**VIA ECF Filing**

Hon. Taryn A. Merkl, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Fair Housing Justice Center, Inc. et al. v. Juda Niayzov et al.*  
Civil Case No.: 1:24-cv-04201  
FKB File No.: 302.175

---

Dear Judge Merkl:

Our firm represents Womcore LLC d/b/a Remax Edge and Xian Jin Zhang (collectively, “Remax”) in the above-referenced matter. We write on behalf of Plaintiffs Patricia Delone-Felix and Stanley Felix, Bianca Jones, and Roslyn Seale; and defendants Nderim Demirovic, 202 Marine LLC, Xueqiang Zheng, Yu Li Weng, and Remax (collectively, the “Parties”). We write in connection with the Court’s order of May 19, 2025. That order granted the application for withdrawal of counsel for defendants Juda Niayzov, Alevtina Ioffe, Exclusive Properties Realty, Inc, (collectively, the “Niyazov Defendants”). The order directed the Niyazov Defendants to have new counsel enter appearance by June 20, 2025, and that “discovery deadlines as to the Niayzov Defendants are temporarily stayed until 6/20/2025, but the Niayzov Defendants may participate in depositions and other discovery between now and 6/20/2025.”

The Parties respectfully request a stay of the previously ordered deposition dates in this matter. Since depositions are scheduled in the interim 30-day period for the Niyazov Defendants to retain new counsel, with the first scheduled only two days after Memorial Day weekend, the Parties have conferred regarding the possibility that the Niyazov Defendants may be prejudiced; either because they currently lack counsel, may be unable to appear for depositions altogether, and will not have time to adequately prepare, whether the retain new counsel in time or if they choose to proceed *pro se*. This is particularly relevant since the Complaint alleges specific interactions between Plaintiffs and the Niyazov Defendants. Moreover, defendant Exclusive Properties Realty, Inc. cannot proceed *pro se* regardless.

In order to ensure that there can be no claims of prejudice by currently unrepresented parties, and to avoid potential duplication of efforts if the Niyazov Defendants seek to re-depose Plaintiffs at a later date, the Parties respectfully request that the Court permit the parties to reschedule the deposition schedule as follows:

*Fair Housing Justice Center, Inc. et al v. Niayzov et al*

Civil Case No.: 1:24-cv-04201

Page 2

---

- June 27, 2025: Patricia Delone-Felix and Stanley Felix (to be continued on June 30 if necessary)
- July 9, 2025: Bianca Jones
- July 10, 2025: Roslyn Seale
- July 16, 2025: Xueqiang Zheng
- July 18, 2025: Yu Li Weng
- July 22, 2025: Xian Jin Zhang
- July 23, 2025: Demerovic
- July 28, 2025: 202 Marine LLC
- July 31, 2025: Remax § 30(b)(6)
- The depositions of the Niyazov Defendants will be scheduled as soon as they are represented by counsel or have appeared *pro se*.

The Parties believe that this will permit opportunity for full participation of all parties, and avoid any potential extraneous costs or delays. We thank the Court for your consideration of this request.

Respectfully submitted,

FURMAN KORNFELD & BRENNAN LLP

Spencer A. Richards  
Asher Kest